

WEST VIRGINIA SECURITIES COMMISSION

STATEMENT OF POLICY

Assignment of Order Identification Numbers

June 26, 2008

The West Virginia Securities Commission Staff has recently expressed concern about the propriety of assigning sequential identification numbers to all types of orders issued by the Commissioner including enforcement actions, general policy issues, and shelf registrations. After a review of current procedures, it has been determined that effective July 1, 2008 the procedure for assigning order identification numbers shall be as follows:

Enforcement Orders: Any order issued pursuant to an enforcement action shall be assigned an identification number by first using the letter "E", immediately followed by the two digit year the case was opened, followed by a hyphen, followed by the case number that was originally assigned to the complaint. If a subsequent order is issued in the same enforcement action the assignment of the identification number shall be done in the same manner, but with the letter "A" added after the case number, and continuing with the next letter of the alphabet as additional orders are issued. **Example:** A cease and desist order is issued for a case instigated in 2008 with case number 1234. Accordingly, the order number would be E08-1234. If a subsequent order were issued in the case, the order number would be E08-1234A.

General Policy Orders: Any general policy order issued shall be assigned an identification number by first using the letters "OR", followed by a hyphen, followed by a sequential number starting with 0001. **Example:** The first general policy order issued on or after July 1, 2008 would be OR-0001; the second such order would be OR-0002.

Shelf Registration Orders: Any order issued pursuant to a shelf registration shall be assigned an identification number by first using the letters "OR", followed by a hyphen, followed by

the two digit year the offering became effective in this State, followed by a hyphen, followed by the registration file number that was originally assigned. If a subsequent order is issued in the same shelf registration the assignment of the identification number shall be done in the same manner, but with the letter "A" added after the registration file number, and continuing with the next letter of the alphabet as additional orders are issued.

Example: A shelf registration order is issued pursuant to a shelf registration filed in 2008 with registration file number 54321. Accordingly, the order number would be OR-08-54321. If a subsequent order were issued in the same shelf registration, the order number would be OR-08-54321A.

Glen B. Gainer, III
State Auditor
Commissioner of Securities

By: Lisa A. Hopkins
General Counsel
Senior Deputy Commissioner of Securities

June 26, 2008